

**PUBLIC OUTREACH SUMMARY AND  
RESPONSE TO PUBLIC COMMENTS  
FINAL EIR**

**APPENDIX 8.4**

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**BURTON MESA ECOLOGICAL RESERVE  
LAND MANAGEMENT PLAN**



The Burton Mesa Ecological Reserve (BMER) Draft Land Management Plan and Environmental Impact Report was released by the Department of Fish and Game (DFG) on July 19, 2005. The public review and comment period extended from July 19, 2005, to September 9, 2005. A Public Meeting was held on July 21, 2005 at Lompoc City Hall, 100 Civic Center Plaza, Lompoc, California. The Initial Study/Environmental Impact Report (EIR) was posted at the Lompoc Public Library and the Vandenberg Village Public Library in Lompoc, the DFG Santa Barbara Field Office and on the Department's internet web page at [www.dfg.ca.gov](http://www.dfg.ca.gov). It was also circulated to the following public agencies for review: Resources Agency; Regional Water Quality Control Board, Region 3; Department of Parks and Recreation; Native American Heritage Commission; Department of General Services; Office of Emergency Services; Office of Historic Preservation; Department of Forestry and Fire Protection; Department of Conservation; Caltrans, District 5; Caltrans, Division of Aeronautics; Department of Toxic Substances Control; and the State Lands Commission. One public agency responded with comments (Santa Barbara County).

Individuals and/or interest groups who commented on the Land Management Plan (LMP) and Environmental Impact Report (EIR), along with the subject area of their comments, are listed in the attached table (Table A). Comments came in the form of mailed letters, e-mails, and verbal comments or submitted comment cards received at the July 21<sup>st</sup> Public Meeting

The Department's Land Management Plan Team categorized the 61 comment letters/testimonies received into eleven subject areas. These include: Public Use (Hunting/Firearms, Cemetery, Motor Vehicles, Horses, Bicycles, Dogs, Bee Keeping, Road Use, Trail Use, Model Airplane and Research); Procedure, Education, Patrol/Enforcement/Communication, Funding, Control of Non-native Species, Agriculture, Wetland Habitats, Adjacent Land Use, and Fire Planning/Fuels Management (fire hazard severity, fuel management zones, fire insurance and prescribed fires.)

The Public Use Element in the Land Management Plan and Section II. Property Description, H. "Existing Public Use Features" discusses allowed public uses and associated ecological reserve regulations. Through the Land Management Planning effort, the Department analyzed multiple aspects of various activities in determining whether or not a public use is compatible: including whether it is a wildlife-dependent activity, whether or not it is safe for all users, whether it benefits or impacts natural or cultural resources, and whether or not it increases management and/or maintenance costs on the property.

## Public Comments and DFG Responses:

### 1. Comments on Public Uses:

Eleven specific uses were identified in the comments. Each use is separated out and responded to distinctly by DFG's Land Management Plan team.

**a) Hunting and Firearms:** Commenters were opposed to hunting on BMER for safety reasons, and were opposed to other firearm activities including shooting and use of paintball firing devices.

#### **DFG Response:**

Through the Land Management Planning effort, including biological inventory and public access components, the Department has determined that there are insufficient areas to allow a quality hunting experience within the BMER. The Land Management Plan is amended and Title 14 Regulations are proposed for amendment to reflect this determination. Baseline species surveys and habitat assessment show lack of suitable habitat and insufficient upland game populations on the BMER to adequately support a hunting program. Additionally, it was learned through this process that access to support a safe hunting program is limited. The restrictions placed on the property by oil company easements and above-ground pipelines, the adjacency of the Air Force Base and Prison, and the close proximity to residential and school properties caused DFG to reassess its previously approved regulation that allowed for upland game hunting in designated areas. No hunting areas have ever been designated, so no change in actual use will occur with the plan or regulatory amendments. The property will be monitored and managed adaptively and will allow for future regulatory changes as conditions change or improve.

Shooting and Paintball activities are not considered hunting and are already prohibited at BMER.

**b) Cemetery:** Commenters requested 150 acres be set aside on the BMER for a National Veteran's Cemetery. Other commenters opposed a cemetery on the BMER.

#### **DFG Response:**

Development of a cemetery within the Ecological Reserve is not a compatible activity, nor is it in keeping with the overall purposes of ecological reserves, see the Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan.

**c) Motor Vehicles:** The majority of commenters expressed opposition to allowing motor vehicles on the BMER and desired more enforcement of unauthorized vehicles on the BMER. Some commenters supported off-road activities on BMER.

**DFG Response:**

The use of motorized vehicles on the Ecological Reserve is not compatible and is prohibited, see the Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan which explains Section 630, Title 14, California Code of Regulations (CCR), including the prohibition of motor vehicles on ecological reserves. DFG concurs that improved enforcement of these regulations is needed.

- d) Horses:** Comments were received in opposition and in support of equestrian use within the BMER. Commenters stated that horses do not damage habitat and equestrians could be a source of volunteer patrol, while other comments referred to existing damage being done at the adjacent La Purisima Mission State Historic Park (off trail use, non-native seed source). Several comments referred to the State Lands Commission Lease with the County of Santa Barbara Sheriff's Department for the Training facility and patrol obligations, suggesting the LMP provide more detail on this topic.

**DFG Response:**

The Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan discuss allowed public uses and associated ecological reserve regulations. Through the Land Management Planning effort, the Department analyzed multiple aspects of various activities in determining whether or not a public use is compatible: including whether it is a wildlife-dependent activity, whether or not it is safe for all users, whether it benefits or impacts natural or cultural resources, and whether or not it increases management and/or maintenance costs on the property. No evidence was found that would warrant a change to the current regulations as they relate to horses. See Section II. Property Description, I. (5) and the Public Use Element in the Land Management Plan for more details, and for information regarding the Sheriff's lease.

- e) Bicycles:** Comments were received in opposition and in support of bicycle use within the BMER. Statements were made that bikes do not damage habitat and that the biking community would be a source of volunteer patrol. Some expressed concern about off-trail use and habitat damage, cutting of manzanita and other vegetation to keep trails cleared, widening of existing trails, and safety problems associated with bicyclists traveling at high rates of speed.

**DFG Response:**

The Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan discusses allowed public uses and associated ecological reserve regulations which prohibit bicycling on ecological reserves. Through the Land Management Planning effort, the Department analyzed multiple aspects of various activities in determining whether or not a public use is compatible: including whether it is a wildlife-dependent activity, whether or not it is safe for all users, whether it benefits or impacts natural or cultural resources, and whether or not it increases management and/or maintenance costs on the property. No evidence was found that

would warrant a change to the current regulations with respect to bicycling. See the Public Use Element in the Land Management Plan for more details.

**f) Dogs:** One commenter suggested the allowance of dogs off-leash at BMER.

**DFG Response:**

The Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan discusses allowed public uses and associated regulations which prohibit pets from entering ecological reserves unless they are on a leash of less than 10 feet. Through the Land Management Planning effort, no evidence was provided that would warrant a change to the current regulations pertaining to pets.

**g) Bee Keeping:** Commenters support bee keeping within the BMER. A local bee keeper commented that his family has been on the site since the 1800's and desires to stay on the grounds.

**DFG Response:**

Bee keeping activities on the Ecological Reserve are not compatible with the purpose or management of the reserve, see the Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan which outlines ecological reserve regulations, including those prohibiting the introduction of species. Specifically, the purpose of an ecological reserve is to conserve populations of plants and wildlife, which include native insects and natural pollination processes. Native insect pollinators evolved in concert with the native vegetation and are effective and sometimes essential pollinators for native flowering plants. Honey bees are not native to this area, and compete directly with native pollinators for pollen and nectar sources. Honey bees can visit different flowering plant species, and travel across larger areas than most native pollinators. They have been documented to sometimes facilitate unnatural hybridization, which can lead to loss of unique, isolated genetic information in populations which previously did not exchange pollen sources. For these reasons, bee keeping on Ecological Reserves is generally not appropriate. If bee keeping were a desirable activity, the State would need to prepare contract documents, solicit bids and provide the opportunity for all qualified bee keepers to submit bids for the site. The Department has determined that it does not have the staffing to conduct the administrative tasks associated with a bee keeping contract on BMER. In addition, the existing unauthorized activity violates the State Constitution, Article XVI, Section 6 "gifting of state resources."

**h) Road Use:** Commenters supported the use of paved roads within the BMER for horses and bikes. One commenter supported additional construction of roads within the BMER to allow maximum use of the site, including the subsequent building of houses within the BMER.

**DFG Response:**

There are no known paved roads within the BMER, with the exception of previously paved patches on segments of dirt roads within BMER. The Department will not

construct new roads within the BMER or pave any existing dirt roads. Minor maintenance of unpaved roads may occur in the future. Motorized vehicles, bicycles, housing development and equestrian uses are not allowed within the BMER whether a road is paved or not.

- i) **Trail Use:** In general, comments favored trails within the BMER. The County specifically asked that the Trails Map (Fig 19) be revised and made clearer in the Final LMP and provide more information on public access points. A recommendation was made to have trails that connect to other trails outside of the ER. Another recommendation was to suggest input from trail users on which trails should remain open and which should be closed or restored back to habitat.

**DFG Response:**

The Final Land Management Plan contains a revised Trails Map (Figure 19). The Trails Map will also be updated as needed to indicate whether a trail has been closed for restoration or whether a connecting trail outside of the BMER has become available for public use. Some trails will be closed and restored as mitigation for the Fuel Management Project as shown on the revised Trails Map (Figure 19). The Department will attempt to involve hikers in subsequent revisions of the Trails Map. See the Public Use Element and the Fuel Management Element of the Land Management Plan and EIR for details.

- j) **Model Airplanes:** One commenter indicated that use of Model Airplanes in a limited area may be desirable.

**DFG Response:**

The Public Use Element and Section II. Property Description, H. "Existing Public Use Features" in the Land Management Plan discusses allowed public uses and associated regulations that prohibit aircraft and motorized vehicles. Further, model airplane use is not a wildlife-dependent activity, nor is it compatible with the purposes of an ecological reserve. Through the Land Management Planning effort, no evidence was provided that would warrant a change to the current regulations to allow for use of Model Airplanes.

- k) **Research:** Commenters were supportive of additional research, specifically research that includes mapping of additional locations of sensitive plants and animals, and to include lichens, mosses, and insects (especially aquatic invertebrates) in future survey efforts.

**DFG Response:**

Research is an area of emphasis that the Department will promote on the BMER. Proposals for valid research will be considered as they are received and partnership arrangements with academic institutions will be pursued. The Biological Element of the Management Plan addresses the need for additional research and surveys on the reserve.

## **2. Comments on Land Management Plan Procedure and Noticing:**

Comments were received regarding insufficient noticing of the Land Management Plan. One commenter stated that the Brown Act must be followed. Some comments assumed the Department had already made decisions on allowable uses within the BMER. Some commenters requested information on the approving entity for the Land Management Plan and EIR. It was also commented that the EIR needs to address cumulative impacts.

### **DFG Response:**

The public meeting was noticed by mail to local residents and interested parties on July 11, 2005, a press release in the local newspaper (Santa Barbara News-Press, July 18, 2005), at the Office of the Santa Barbara County Clerk, on the Department of Fish and Game website, on the website of Condor Environmental Planning Services, and by mail to state agencies by the State Clearinghouse. The Lompoc Record, 7/22/05 and Santa Barbara News-Press, 7/20/05 published various articles on the Land Management Plan/Draft EIR planning process with information on comment submittals. Hard copies of the draft documents were also available at the Lompoc and Vandeburg Village Public Libraries. The public meeting was held pursuant to the provisions of CEQA. No Notice of Preparation (NOP) responses were received during the 30 day notice period for state agencies. The public comment period, July 19, 2005 through September 9, 2005 exceeded the number of days required by law. The Department's land management planning meetings are not subject to the Brown Act. Appropriate uses were determined through the land management planning effort and based on ecological reserve statutory requirements in addition to designation criteria for adoption of regulations by the California Fish and Game Commission. The LMP and EIR were released as draft documents for solicitation of public comments which are evaluated and considered by the Department in publishing the final EIR. The Director of the Department of Fish and Game approves the Final Land Management Plan and Final EIR. Section 5 Significant Environmental Effects in the EIR is amended with the following language to address cumulative impacts:

Because the impacts of implementing the plan and mitigation measures will be less than significant, the project will have no cumulative impacts.

## **3. Comments on Education:**

Multiple comments were received stating the need for and value of education regarding the Burton Mesa. Individuals and groups (La Purisima Audubon Society, Citizens Planning Association of Santa Barbara County) wanted to work with the Department to create an educational program at BMER, including development of materials and field trips, provide docent led programs, volunteers and conduct school projects and research programs. One commenter stated that public access programs should be in consideration of the rarity and sensitivity of the chaparral.

### **DFG Response:**

The Public Use Element of the management plan addresses public education, including the development of educational programs, materials and volunteer programs.



#### **4. Comments on Patrol, Enforcement and Communication:**

Comments were received on four patrol/enforcement issues, 1) individuals offered to/or currently perform limited patrol and would continue to assist the Department in this effort, 2) statements that additional enforcement patrols and on-site staff (caretaker) are needed on the BMER, 3) individuals suggested the need for contact information and a process by which they can report enforcement issues and problems, and 4) comments regarding the County's Sheriff Equestrian Training Facility. The County specifically commented that a lease between the state and County Sheriff allows for mounted unit patrol as well as off-duty equestrian use in the Reserve, suggesting that the LMP should include a specific policy to allow for Sheriff equestrian use of the Reserve.

#### **DFG Response:**

Site security is addressed in the Administration Element of the plan. The Sheriff's Equestrian Lease is specifically cited here and in Section II. Property Description D. Management Units and I. Existing Commercial Lease Features. The Department cautions the public to not take enforcement action on their own, but that violations can be reported through the Department's enforcement hotline (888) 334-2258 (1-888-DFG CALTIP) and by contacting local law enforcement agencies. Public reports of violations of ecological reserve regulations are important to protection of the area. Reserve regulations are enumerated in Section II. Property Description, H. "Existing Public Use Features" and discussed in the Public Use Element of the plan.

#### **6. Comments on Funding:**

Comments were received supporting the need to find funds to implement the LMP. In particular, the County of Santa Barbara comments reflected the desire to cooperate in soliciting of Grant Funding for fuel modification at the BMER boundaries.

#### **DFG Response:**

Funding management of ecological reserves, including Burton Mesa Ecological Reserve continues to be a challenge. The department will continue to seek funding for implementation of the management plan and will coordinate with the County specifically for fuel management funding. The Department appreciates public support for funding for management of the Burton Mesa Ecological Reserve.

#### **7. Comments regarding Control of Non-native Species:**

Commenters strongly support control of non-native plant species in and around the BMER, including Italian thistle, veldt grass, Sahara mustard and pampas grass, which appear to be spreading and increasing rapidly in the area. A recommendation to train and involve a volunteer group specifically for treating non-natives was made. A specific recommendation by the Citizens Planning Association of Santa Barbara was made to involve the County Weed Management program to assist by sponsoring a pampas grass elimination program for homeowners and businesses.

#### **DFG Response:**

The Biological Element, Non-Native Species and Nuisance Species section of the LMP addresses the identification, treatment and control of non-native and nuisance species on

the reserve. Treatment of established infestations will be reviewed within the context of the larger reserve ecosystem. They may be more problematic to control, and where these occur on the preserve boundary, they would be a lower priority than smaller infestations in interior habitat areas. Some established iceplant patches may be problematic to remove where they occur on steep sandy slopes abutting residential areas, and if removed, some other form of erosion controlling vegetation would need to be installed. The use of volunteers could greatly assist this effort to control non-native plants and their participation in management activities on the reserve is addressed in the Public Education Element of the LMP. This portion of the plan in section IV. Management Goals and Tasks B (5) will be revised to add the following text in

Task (4): Coordinate with Santa Barbara County Weed Management Area in controlling non-natives.

### **8. Comments on Agriculture:**

Comments received include recommendations to not allow agriculture of any kind (including cattle grazing) within the BMER and a comment specifically from the County which stated that the "EIR lacks analysis on the loss of 445 acres dry farmed and 165 acres grazing land. The EIR should analyze impacts to agricultural resources and provide a clear explanation of the thresholds used to make the determination of 'Environmental Effects Found not to be Significant' for agricultural resources."

### **DFG Response:**

The restoration of agricultural land to native habitat as proposed in the management plan does not have an adverse impact to the physical environment as defined by CEQA. In fact, this restoration will have a beneficial effect on the environment, as described in Section IV Management Goals and Tasks B. Biological Element 7. Habitat Restoration and is consistent with the purpose of the BMER. Consequently, it does not constitute a significant environmental effect under CEQA and does not require analysis as such. In addition, the restoration of agricultural areas on BMER is necessary to mitigate impacts of the Fuel Management Plan.

The following information is not required by CEQA but is being included for policy purposes per a California Resources Agency Memo of May 4, 2005. This is consistent with the CEQA Guidelines which state that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. However, economic or social effects of a project shall not be treated as significant effects on the environment (Section 15131, Title 14, California Code of Regulations).

Lands currently under lease for farming within the Burton Mesa ER have been utilized for farming since the 1930s. Farming methods typically include dryland farming of either annual bean crops or annual grasses for hay production. No irrigation is used. The fields have been more or less leveled for many years, but are not laser-leveled, and fields are disked each season prior to planting. In some years, more than one annual crop is produced. Given the fields are unirrigated and crops rely on rainfall and local perched water tables, fine particulates can be picked up and become airborne during windy, dry weather,

which can extend over several months or longer. Weeds establish on the perimeter of fields, reducing the habitat value of adjacent areas and increasing wildfire risk in certain locations. (for instance, adjacent to north Mesa Oaks).

The Department may consider new commercial leases for managed grazing in localized areas to achieve specified restoration targets, if appropriate. Any such use of livestock would require the preparation of a specific restoration plan addressing how this tool would be used and how desirable natives would be protected. However, the Department has no immediate plans to use livestock grazing for management purposes at the present time. Carefully timed and controlled livestock grazing can sometimes be used to control certain types of weed invasions. This is sometimes done with small herds of sheep or goats which can be herded and confined to a localized area. For example, intensive selective grazing pressure can knock down and weaken non-native veldt grass. Additional information about agricultural leases can be found in Section II Property Description G. 1. Agricultural Operations, I. 2. Current Cultivated Agriculture and I. 3. Current Cattle Grazing, as well as in the Commercial Lease Element of the LMP.

#### **9. Comments on Wetland Habitat:**

Comments received on wetland habitats include references to the Army Corps of Engineers definition of wetlands (County of Santa Barbara letter) and general comments about wetlands observations and the need to protect them.

#### **DFG Response:**

The federal wetland delineation process is aimed at determining whether an area supports predominantly hydrophytic plants, hydric soils and wetland hydrology. It is used to map the extent and limits of wetlands subject to federal regulations. This is not a methodology for classifying wetlands. The Holland system used in Table 20a was developed by the Department of Fish and Game, not the California Native Plant Society. The Department is aware that there is a series of isolated seasonal wetlands which form at various locations along the northern boundary, usually associated with a system of ditches that appear to have been constructed to intercept shallow sheet flow before it reaches the residential area. Department staff have observed wetland dependent plants and Pacific chorus frog tadpoles in these wetlands. The Department appreciates reports of ongoing observations in this area. The LMP addresses protection of these localized wetlands where they occur within areas proposed for public use and management, including fuel reduction areas (such as Segments 7 and 8).

#### **10. Comments on Adjacent Land Use and Development:**

Comments received include specific references to private properties adjacent to the BMER.

#### **DFG Response:**

The Department is interested in working with local jurisdictions and private land owners on any proposed land use changes on parcels adjacent to the BMER. With respect to property transfers, the Department suggests contacting the County of Santa Barbara about

transactions that may have occurred prior to 1999, when Department of Fish and Game became the land manager for BMER.

## **11. Fire Planning/Management**

Four different categories of comments dealing with Fire Management Planning or Fuels Reduction were received, primarily from the County of Santa Barbara. These are described below with a response given for each.

- a) **Fire Hazard Severity:** Comments received include that fuels management should be prioritized in the LMP. The County of Santa Barbara states in their comment letter that the BMER is a “high fire hazard area” and fire management should be strongly emphasized in the LMP.

### **DFG Response:**

The Department is unaware of any official designation of fire hazard severity for the property but has provided a proposed Fuel Management Plan in the LMP. The Department has a proposed plan to reduce fuel loads on the perimeter of the BMER adjacent to residential and other developed areas. Details on fuel management actions and mitigation measures can be found in the Fuel Management Element of the LMP and in the Final EIR discussion on impacts associated with the Fuel Management Plan.

- b) **Fuel Modification Zones:** The County of Santa Barbara comments state that Section 4291 of the Public Resources Code and Section 51182 of the Government Code authorize local fire agencies to clear up to 100 feet for fuel management and they recommend at this site to allow a 70% cover reduction within that 100 foot zone. The County suggests the LMP and EIR be modified to reflect this 100 foot clearance allowance. The county also suggests the Department allow for pile burning as a treatment method in the Fuel Management Plan and address how weeds will be controlled in the fuel management zones.

### **DFG Response:**

Government Code Section 51182 does not apply to the Reserve as it represents land kept in a predominantly natural state as habitat for wildlife, plant or animal communities (see Government Code Section 51184). Despite this, DFG has proposed substantial reductions in flammable vegetation, especially within the first 33-66 feet of the urban/wildland interface. These reductions on the Reserve would be in addition to existing structural setbacks, backyards, streets and other areas on private land where the responsibility for creating defensible space adjacent to structures is critical. Additional language added to the Plan under Section V: Burton Mesa Fuel Management Plan D. Menu of Treatment Methods includes a new Section, 8. Pile Burning:

#### **8. Pile Burning**

Allow the use of pile burning on a site specific, case by case basis, where other disposal methods are unavailable. Burn piles will be placed on previously disturbed ground to

minimize damage to surrounding habitat and in locations where subsequent weed invasion can be effectively managed. Burn piles may not be placed in areas of wetlands or sensitive habitats.

The maintenance of the Fuel Management Zones (FMZs), including control of weeds, will be done on an as-needed basis. Non-flammable weeds may also be controlled within the treatment areas during fuel reduction work and during periodic fuel break maintenance episodes. An Integrated Pest Management Approach will be used which relies upon a variety of methods including hand removal, seed head removal, and spot treatments with glyphosate-based herbicides. New weed invasions will be prioritized for control efforts within the FMZs. The Plan describes how flammable invasive species would be controlled within the FMZs, and includes methods to reduce the introduction of weeds when treatments occur. Additional language will be added to the Plan under Section V: Burton Mesa Fuel Management Plan, Menu of Treatment Methods. It will explain how general weed control would be performed within the FMZs.

The additional text under D. Menu of Treatment Methods will read as :

#### 9. General Weed control

Non-flammable weeds may also be controlled within the treatment areas during fuel reduction work and during periodic fuel break maintenance episodes. An Integrated Pest Management Approach will be used which relies upon a variety of methods including hand removal, seed head removal, and spot treatments with glyphosate-based herbicides. New weed invasions will be prioritized for control efforts within the FMZs. Treatment of established infestations will be reviewed within the context of the larger preserve ecosystem. They may be more problematic to control, and where these occur on the preserve boundary, they would be a lower priority than smaller infestations in interior habitat areas. Some established iceplant patches may be problematic to remove where they occur on steep sandy slopes abutting residential areas - if removed, some other form of erosion controlling vegetation would need to be installed.

In addition, the Department anticipates a partnership with the County Fire Department to maintain the fuel management zones on an annual basis once initial treatment of the zones is completed.

- c) Fire Insurance:** The County of Santa Barbara comments state that the LMP should acknowledge the difficulties that the adjacent residents have in obtaining fire insurance, and that Reserve Management practices should include specific actions to reduce fire hazard at the Reserve boundary.

#### **DFG Response:**

Coordination with insurance companies is not the Department's direct responsibility and it is beyond DFG's current abilities to commit limited staff time to this purpose. The Department also notes that in review of recently approved development projects in the

area, the issue of difficulties in obtaining fire insurance is not mentioned or addressed. New residential developments continue to be approved adjacent to high fire hazard areas such as the Burton Mesa chaparral. It is the Department's belief that local jurisdictions need to address development proposals adjacent to the BMER and need to account for the required defensible space within their project footprint and mitigate for any impacts associated with loss of habitat pursuant to CEQA. For details on the specific actions proposed by the Department to reduce fire hazard at the Reserve boundary see the Fire Management Element and Fuel Management Plan sections of the LMP.

- d) **Prescribed Fires:** The County of Santa Barbara comment letter states that the LMP should promote prescribed burning as an alternative to wildfire and evaluate this alternative in the EIR.

**DFG Response:**

As described in the EIR (Section 7.0 Alternatives (b)), the Department considered prescribed fire but eliminated it from further review for primarily ecological reasons. Most importantly, because prescribed fires are typically conducted out of season in order to control the intensity and spread, this means they are generally done under moister and cooler conditions with higher fuel moisture levels. Since chaparral and scrub vegetation types are adapted to a regime of generally intense, dry season fires, imposition of an artificial regime of low intensity cool season fires by prescribed burning can produce undesirable ecological side effects and potentially severely damage vegetation. We acknowledge that prescribed burning can reduce fuel loads, but generally this practice does not prevent a wildfire from burning through a previously treated area. Additionally, out of season prescribed fires using low intensity prescriptions can fail to produce sufficient heat to destroy the seed of opportunistic annuals, thus creating conditions favorable to the introduction of exotic weeds which produce flashy annual fuels which are also hazardous. Should the Department's abilities to implement ecologically appropriate prescribed fires improve, this activity could be considered in the future. This response above will be added in full to the EIR, replacing Alternatives Section 7.0 (b).